

EXHIBIT B

Weil, Gotshal & Manges LLP

VIA E-MAIL AND FEDERAL EXPRESS

767 Fifth Avenue
New York, NY 10153-0119
+1 212 310 8000 tel
+1 212 310 8007 fax

Mindy J. Spector

March 10, 2015

Lewis J. Liman, Esq.
Cleary Gottlieb Steen & Hamilton LLP
One Liberty Plaza
New York, NY 10006-1470

Re: *Rio Tinto plc v. Vale S.A., et al., Civil Action No. 14-cv-3042 (RMB)(AJP)(S.D.N.Y.)*

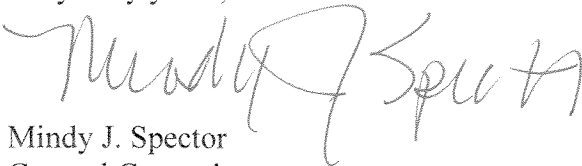
Dear Lewis:

I am writing pursuant to Rule 45(d)(2)(B) of the Federal Rules of Civil Procedure to set forth Weil, Gotshal & Manges LLP's ("Weil") objections to the subpoena served on Weil in the above referenced matter.

Weil objects to the subpoena on the grounds that documents responsive to the subpoena would be in the possession of Rio Tinto plc or its counsel Quinn Emanuel. As I advised you on the telephone, confirming what you already knew, the above referenced matter and the files relating to it, were transferred to Quinn Emanuel when the Weil attorneys working on the matter left Weil to join Quinn Emanuel. Under these circumstances, Weil, a non party to this matter, should not have to incur the burden and costs associated with searching for responsive documents - - most of which will be protected by either attorney-client privilege or attorney work product. The only arguable exception to this is Request No. 1 of the subpoena. In this regard, we have searched our files and do not have documents responsive to that Request.

Finally, the subpoena is overly broad and seeks documents which are not relevant and not likely to lead to the discovery of relevant or admissible evidence.

Very truly yours,



Mindy J. Spector
General Counsel